

THE HONORABLE THOMAS S. ZILLY

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

JILLIAN HORMAN, an individual,

Plaintiff,

v.

SUNBELT RENTALS, INC., *et al.*,

Defendants.

Case No. 2:20-cv-00564-TSZ

**DECLARATION OF ADA K. WONG  
IN SUPPORT OF PLAINTIFF'S  
THIRD MOTION TO COMPEL  
DISCOVERY RESPONSES**

I, Ada K. Wong, declare,

1. I am an attorney of record for Plaintiff Jillian Horman in this matter and make the following statements based on my personal knowledge.

2. On February 10, 2021, Plaintiff served Defendant Sunbelt Rentals, Inc. ("Sunbelt") with Plaintiff's Third Set of Requests for Production ("Plaintiff's Third Requests"). Attached hereto as **Exhibit A** is a true and correct copy of Plaintiff's Third Requests.

3. On February 19, 2021, Plaintiff served Sunbelt with Plaintiff's Fourth Set of Requests for Production ("Plaintiff's Fourth Requests"). Attached hereto as **Exhibit B** is a true and correct copy of Plaintiff's Fourth Requests.

1           4.       On March 12, 2021, Sunbelt served its Answers and Objections to Plaintiff's Third  
2 Requests. Attached hereto as **Exhibit C** is a true and correct copy of Sunbelt's Answers and  
3 Objections to Plaintiff's Third Requests.

4           5.       On March 17, 2021, Plaintiff served Sunbelt with Plaintiff's Third Set of Requests for  
5 Admission ("Plaintiff's Third Admissions Requests"). Attached hereto as **Exhibit D** is a true and  
6 correct copy of Plaintiff's Third Admissions Requests.

7           6.       On March 19, 2021, Sunbelt served its Answers and Objections to Plaintiff's Fourth  
8 Requests. Attached hereto as **Exhibit E** is a true and correct copy of Sunbelt's Answers and  
9 Objections to Plaintiff's Fourth Requests.

10          7.       Attached hereto as **Exhibit F** is a true and correct copy of Defendant's Bates No.  
11 SB/Horman-DEF\_01407, produced by Sunbelt in the course of discovery on March 22, 2021.

12          8.       Attached hereto as **Exhibit G** is a true and correct copy of Defendant's Bates No.  
13 SB/Horman-DEF\_01640, produced by Sunbelt in the course of discovery on March 22, 2021.

14          9.       On April 15, 2021, Sunbelt served its Answers and Objections to Plaintiff's Third  
15 Admissions Requests. Attached hereto as **Exhibit H** is a true and correct copy of Sunbelt's Answers  
16 and Objections to Plaintiff's Third Admissions Requests.

17          10.      On April 27, 2021, Plaintiff served Sunbelt with Plaintiff's Sixth Set of Requests for  
18 Production ("Plaintiff's Sixth Requests"). Attached hereto as **Exhibit I** is a true and correct copy of  
19 Plaintiff's Admissions Sixth Requests.

20          11.      On May 7, 2021, Plaintiff served Sunbelt with Plaintiff's Seventh Set of Requests for  
21 Production ("Plaintiff's Seventh Requests"). Attached hereto as **Exhibit J** is a true and correct copy  
22 of Plaintiff's Seventh Requests.  
23

1           12.     On May 18, 2021, I took the deposition of Brent Johnson in his lay witness capacity.  
2 Attached hereto as **Exhibit K** is a true and correct copy of the relevant portions of the deposition.

3           13.     On May 20, 2021, Plaintiff served Sunbelt with Plaintiff's Eighth Set of Requests for  
4 Production ("Plaintiff's Eighth Requests"). Attached hereto as **Exhibit L** is a true and correct copy  
5 of Plaintiff's Eighth Requests.

6           14.     On May 25, 2021, I took the depositions of Vicky S. Gibson as a lay witness and Rule  
7 30(b)(6) representative. Attached hereto as **Exhibit M** is a true and correct copy of the relevant  
8 portions of these depositions.

9           15.     On May 27, 2021, Sunbelt served its Answers and Objections to Plaintiff's Sixth  
10 Requests. Attached hereto as **Exhibit N** is a true and correct copy of Sunbelt's Answers and  
11 Objections to Plaintiff's Sixth Requests.

12           16.     On May 28, 2021, I took the deposition of Brent Johnson as a Rule 30(b)(6)  
13 representative of Defendant Sunbelt Rentals, Inc. Attached hereto as **Exhibit O** is a true and correct  
14 copy of the relevant portions of the deposition.

15           17.     On June 7, 2021, Sunbelt served its Answers and Objections to Plaintiff's Seventh  
16 Requests. Attached hereto as **Exhibit P** is a true and correct copy of Sunbelt's Answers and Objections  
17 to Plaintiff's Seventh Requests.

18           18.     Attached hereto as **Exhibit Q** is a true and correct copy of my June 15, 2021 letter to  
19 Sunbelt's counsel detailing the parties' positions on Plaintiff's Third Requests, Plaintiff's Fourth  
20 Requests, Plaintiff's Sixth Requests, and Sunbelt's redactions to Defendant's Bates No. SB/Horman-  
21 DEF\_01407, attached hereto as **Exhibit F**, and Defendant's Bates No. SB/Horman-DEF\_01640,  
22 attached hereto as **Exhibit G**.  
23

1           19.     On June 17, 2021, Sunbelt served its Answers and Objections to Plaintiff's Eighth  
2 Requests. Attached hereto as **Exhibit R** is a true and correct copy of Sunbelt's Answers and  
3 Objections to Plaintiff's Eighth Requests.

4           20.     Attached hereto as **Exhibit S** is a true and correct copy of Defendant's Bates No.  
5 SB/Horman-DEF\_00334, produced by Sunbelt in the course of discovery. Exhibit S was entered as  
6 Exhibit 25 during the May 18, 2021 deposition of Brent Johnson.

7           21.     Attached hereto as **Exhibit T** is a true and correct copy of the document that was  
8 entered as Exhibit 7 (Bates Nos. SB/Horman-DEF\_00228-00231) during the May 25, 2021 deposition  
9 of Vicky Gibson.

10          22.     Attached hereto as **Exhibit U** is a true and correct copy of the document that was  
11 entered as Exhibit 51 (Bates No. SB/Horman-DEF\_00156) during the May 28, 2021 Rule 30(b)(6)  
12 deposition of Brent Johnson.

13          23.     Attached hereto as **Exhibit V** is a true and correct copy of Defendant's Bates No.  
14 SB/Horman-DEF\_01364, produced by Sunbelt in the course of discovery on March 22, 2021.

15          24.     Attached hereto as **Exhibit W** is a true and correct copy of the document that was  
16 entered as Exhibit 46 (Bates No. SB/Horman-DEF\_01317) during the May 28, 2021 Rule 30(b)(6)  
17 deposition of Brent Johnson.

18          25.     Attached hereto as **Exhibit X** is a true and correct copy of the document that was  
19 entered as Exhibit 47 (Bates Nos. SB/Horman-DEF\_01318-001319) during the May 28, 2021 Rule  
20 30(b)(6) deposition of Brent Johnson.

21          26.     Attached hereto as **Exhibit Y** is a true and correct copy of the document that was  
22 entered as Exhibit 49 (Bates Nos. SB/Horman-DEF\_00275-00280) during the May 28, 2021 Rule  
23 30(b)(6) deposition of Brent Johnson.

28. Attached hereto as **Exhibit AA** is a true and correct copy of the document that was entered as Exhibit 12 (Bates Nos. SB/Horman-DEF\_00432-00433) during the May 25, 2021 deposition of Vicky Gibson.

29. Attached hereto as **Exhibit BB** is a true and correct copy of the document that was entered as Exhibit 8 (Bates Nos. SB/Horman-DEF\_00238-00243) during the May 25, 2021 deposition of Vicky Gibson.

I declare under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct and is based upon my personal knowledge.

**DATED** July 8, 2021, at Mountlake Terrace, Washington.

Ada K. Wong, WSBA #45936

**CERTIFICATE OF SERVICE**

I hereby certify that on July 8, 2021, I caused to be electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following:

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I declare under penalty of perjury under the laws of the state of Washington that the foregoing is true and correct.

DATED: July 8, 2021, at Mountlake Terrace, Washington.

/s/ Kaila A. Eckert  
Kaila A. Eckert